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**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE	§	CASE NO. 09-36300-sgj
	§	
1300 CAMPBELL, L.P.	§	CHAPTER 11
	§	
DEBTOR.	§	Hearing set - December 4, 2009
	§	at 9:30 a.m.

**WITNESS AND EXHIBIT LIST**

**Comes Now**, GE Commercial Finance Business Property Corporation f/k/a General Electric Capital Business Asset Funding Corporation ("GEBP"), and files this its Witness and Exhibit List relating to GEBP's Motion for Relief from Stay, Debtor's Second Motion for Authority to Use Cash Collateral, Debtor's Motion for Authority to Enter into First Amendment to Commercial Lease Agreement, and Debtor's Motion for Approval of Debtor in Possession Financing Pursuant to 11 U.S.C. §364(d). The GEBP hereby identifies the following witnesses who may be called to testify at the hearing:

**Witnesses**

1. Terrance P. Cosgrove
2. Julius Blatt
3. Sheila Adlof
4. Any witness designated or called by any other party.
5. Any witness deemed necessary or appropriate at the hearing.

GEBP may introduce the following Exhibits:

**Exhibits**

1. Promissory Note - 5.18.99
2. Commercial Deed of Trust, Security agreement, Assignment of Leases and Rents and Fixture Filing - 5.18.09
3. UCC 1 dated 6.1.09 - Filed under 99-106458
4. UCC Continuation 04-00609019 dated 3.17.04 to UCC 99-106458
5. Promissory Note - 7.21.04
6. Commercial Deed of Trust, Security Agreement, Assignment of Leases and Rents, and Fixture Filing - 7.21.04
7. Assignment of Rents and Leases dated 7.21.04
8. UCC 1 dated 7.27.04 - Filed under 04-0076192544
9. UCC Continuation 09-00063635 dated 3.5.09 to UCC 04-0076192544
10. UCC 1 dated 7.23.04 - Filed under 04-0075972357
11. Commercial Lease Agreement with Advanced Paradigm, Inc.
12. Tenant Estoppel Certificate dated 7.15.04
13. Nondisturbance, Attornment and Subordination Agreement
14. Letter from GE to Patrick Calvano regarding loan maturity date dated 3.17.09
15. Letter from Gatex Properties to GE regarding loan maturity dated 7.6.09
16. Letter from GE to Gatex Properties in response to Gatex' 7.6.09 letter dated 7.23.09
17. Demand letter to Debtor dated 9.1.09, overnight delivery receipts
18. Letter to Tenant to remit future rental payments to GEBP dated 9.1.09, overnight delivery receipts
19. Any documents filed in this case
20. Any exhibit designated by any other party
21. Any exhibit necessary for impeachment and/or rebuttal

Dated this 1<sup>st</sup> day of December, 2009.

Respectfully Submitted,

**MORGAN & LUTTRELL, L.L.P.**

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By: *F. Beth Morgan*

F. Beth Morgan

Texas State Bar No. 14438300

Leslie M. Luttrell

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Attorneys for GE Commercial Finance Business  
Property Corporation f/k/a General Electric Capital  
Business Asset Funding Corporation (GEBP)

## **CERTIFICATE OF SERVICE**

I, F. Beth Morgan, do hereby certify that on the 1<sup>st</sup> day of December, 2009, I transmitted a copy of the foregoing instrument, electronically and/or by depositing same in the United States First Class Mail, postage prepaid to the following:

### ***Debtors***

1300 Campbell, L.P.  
1300 East Campbell Road  
Richardson, Texas 75081

### ***Debtor's Counsel***

Joseph F. Postnikoff  
Goodrich Postkikoff & Albertson, LLP  
777 Main Street, Suite 1360  
Fort Worth, Texas 76102

### ***US Trustee's Office***

U.S. Trustee  
Attn: Nancy Resnick  
1100 Commerce Street  
Room 976  
Dallas, Texas 75242-1496

### ***Notices of Appearance and parties in interest***

Elizabeth Banda  
Perdue, Brandon, Fielder, Collins & Mott, L.L.P.  
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